

IN THE UNITED STATES DISTRICT COURT  
Case 2:18-cv-00342 Document 1-1 Filed 08/15/18 Page 1 of 5  
JEROME JUNIOR WASHINGTON PLAINTIFF  
V. PLAINTIFF  
C. O. J. JONES, et. al.; DEFENDANTS  
CLERK, U.S. DISTRICT COURT  
WEST DIST. OF PENNSYLVANIA

RECEIVER  
MAR 13 2019 15370  
/KEL

PRISONERS COMPLAINT FORM  
42 U.S.C § 1983 AND 28 U.S.C § 1331 (a)  
TO OBTAIN RELIEF FROM VIOLATION OF  
FEDERAL LAWS BY DEMANDED FOR  
JURY TRIAL JURISDICTION.

**INTRODUCTION:**  
• PLAINTIFF JEROME JUNIOR WASHINGTON IS HEREBY PRO-SE LITIGANT FOR THIS SWORN VERIFICATION  
AND COMPLAINT. STATEMENT OF TESTIMONY HEREIN AS FOLLOW FOR THE UNITED STATES WESTERN  
DISTRICT OF PENNSYLVANIA TO OVERSEE THEIR JURISDICTION FOR THIS DECLARED PRISONERS  
COMPLAINT UNDER PENNSYLVANIA TO PENALTY OF PERJURY. PURSUANT RELIEF UNDER THE UNITED STATES WESTERN DISTRICT 42  
U.S.C. § 1983 AND 28 U.S.C. § 1331 (a) TO OBTAIN RELIEF FROM VIOLATIONS OF FEDERAL LAWS. TO THE  
VIOLATIONS OF PLAINTIFF 8<sup>th</sup> AND 14<sup>th</sup> AMENDMENT RIGHTS OUT OF RETALIATION. TO PLAINTIFF TO VIOLATED THE  
PLAINTIFF CONSTITUTIONAL LAWS OF PRISONERS RIGHTS. TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT  
BY PRISON OFFICIALS OR PRISONERS AGGRESSION AND VIOLENCE. WHILY THE PLAINTIFF STRUGGLE UPON MENTALLY PHYSICALLY AND EMOTIONALLY HARM  
DAMAGES AND PAIN AND SUFFERING. WHILY THE PLAINTIFF SUPERVISORY AND HARSHNESS OF OVERALL  
SCI-GREENE SRTU GB PROGRAM OVERSEE BY THE SUPERINTENDENT/WARDEN MR. GILMORE IS THE OVERALL PROTECTOR DEFENDANT TO THE  
SUPERINTENDENT/WARDEN MR. GILMORE IS THE OVERALL PROTECTOR DEFENDANT TO THE SUPERVISORY AND HARSHNESS OF OVERALL  
PRISONERS AND PRISON OFFICIAL TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT. C.C. J. JONES  
FALSIFIED MISCONDUCT AND IRRATIONALLY PARTICIPATING IN THE SCI-GREENE SRTU GB PROGRAM ON 3/28/18 AROUND 3:30pm  
ASSAULTIVE AND BATTERY EXISTED BY EXCESSIVE FORCE "(DC-ADM001)" POLICY. VIOLATION.

**I. JURISDICTION OR COMPLAINT**

1.) PLAINTIFF JEROME JUNIOR WASHINGTON WAS CONFINED AT SCI-GREENE SRTU PROGRAMMING ON GB UNIT AS  
AN MENTAL HEALTH SM/ED D-ROSTER PATIENT LOCATED AT SCI-GREENE 175 PROGRESS DRIVE/WAYNESBURG PA 15370 UPON THE  
CORRECTIONAL INSTITUTIONS LOCATED AT SCI-GREENE 175 PROGRESS DRIVE/WAYNESBURG PA 15370 UPON THE  
DEFENDANTS CONSTITUTIONAL VIOLATIONS OF LAWS TO THE 8<sup>th</sup> AND 14<sup>th</sup> AMENDMENT IS KICKED

2.) PLAINTIFF JEROME JUNIOR WASHINGTON IS AND WAS AT ALL TIMES MENTIONED HEREIN AN ADULT  
CITIZEN OF THE UNITED STATES AND A RESIDENT OF THE STATE OF PITTSBURGH, PENNSYLVANIA

3.) DEFENDANT, SUPERINTENDENT MR. GILMORE WAS AT ALL TIMES HEREIN SUPERINTENDENT/WARDEN OF THE MUNICIPAL PRISON. FOR THE CITY OF PITTSBURGH  
AND THE STATE OF PENNSYLVANIA DEFENDANT GILMORE MANAGES ITS DAY TO DAY OPERATION AND  
EXECUTES THE PRISON CORPORATION OF POLICES PRACTICES AND PROCEDURES AT ALL RELEVANT TIMES  
MEMION HEREIN PLAINTIFF SCI-GREENE SRTU-GB PROGRAM COMPLAINT.

4.) DEFENDANT, C.O. J. JONES WAS AT ALL RELEVANT TIMES HEREIN AN EMPLOYEE/GUARD OF THE PRISON  
OF SCI-GREENE SRTU GB UNIT AS AN PRISON GUARD AND WARDEN AT SCI-GREENE  
OFFICER WORKING ON 2 TO 10 SHIFT ON 3/28/17 TO COMMIT THE OFFICIAL CORRECTJONAL  
8<sup>th</sup> AND 14<sup>th</sup> AMENDMENTS RIGHTS TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT.

5.) AS EMPLOYEE'S HEREIN EMPLOYMENT JOB ASSIGNMENT IS PRISON GUARDS AND WARDEN AT SCI-GREENE  
175 PROGRESS DRIVE/WAYNESBURG PA 15370 AS THE ABOVE NAMED DEFENDANTS

6.) DEFENDANT'S CITY OF PITTSBURGH AND STATE OF PENNSYLVANIA IS WHERE DEFENDANTS WAS AT ALL  
RELEVANT TIMES HEREIN A MUNICIPAL CORPORATION OF THE STATE OF PENNSYLVANIA.

7.) THIS ACTION ARISES UNDER AND IS BROUGHT PURSUANT TO 42 U.S.C. SECTION 1983 TO REMEDY THE  
DEPRIVATION UNDER COLOR OF STATE LAW, OF RIGHTS GUARANTEED BY THE EIGHTH AND FOURTEENTH  
AMENDMENTS TO THE UNITED STATES CONSTITUTION. THIS COURT HAS JURISDICTION OVER THIS ACTION  
PURSUANT TO 28 U.S.C. SECTION 1331 AND 1333...

8.) PLAINTIFF'S CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY RULE 65 OF THE FEDERAL RULES  
OF CIVIL PROCEDURE.

9.) THIS CAUSE OF ACTION ARISE IN THE WESTERN DISTRICT OF PENNSYLVANIA. THEREFORE, VENUE  
IS PROPER UNDER 28 U.S.C. SECTION 1331(b).

THE PREVIOUS LAWSUITS BY PLAINTIFF

10.) THE PLAINTIFF HAS FILED OTHER LAWSUITS DEALING WITHIN THE SAME FACTS INVOLVED INTO  
THIS ACTION OR COMPLAINT. OTHERWISE RELATING TO PLAINTIFF JEROME JUNIOR WASHINGTON  
HVO282, IMPRISONMENT AT SCI-GREENE/175 PROGRESS DRIVE/WAYNESBURG PA, 15370 CORRECTIONAL  
INSTITUTIONS AS FOLLOW

(A) A.) HAVE YOU FILED OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS YES  NO   
(B) IF YOUR ANSWER TO (A) IS YES, DESCRIBE EACH LAWSUIT BY ANSWERING QUESTIONS 1 THROUGH 7 BELOW: (IF THERE IS MORE THAN ONE LAWSUIT DESCRIBE THE ADDITIONAL LAWSUIT ON ANOTHER SHEET OF PAPER, USING THE SAME FORMAT.)

1) PARTIES; TO THE PREVIOUS LAWSUIT;

PLAINTIFF: JEROME WASHINGTON

DEFENDANT: CHRIS ROZICH; et; al.

2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT NAME THE COUNTY; EASTERN DISTRICT COURT.

3) DOCKET OR INDEX NUMBER: CIVIL DIVISION NO. 2:14-CV-05561-ER

4) NAME OF JUDGE ASSIGNED TO YOUR CASE THE HONORABLE EDUARDO C. ROBRENO, J.

5) APPROXIMATE DATE OF FILING LAWSUIT

6) IS THE CASE STILL PENDING? YES  NO

7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ON AN HONORABLE ANSWER OR JUDGMENT OF THE JURISDICTION'S ORDERED OR THE CASE.

C) 1) PARTIES; TO THE PREVIOUS LAWSUIT

PLAINTIFF: JEROME WASHINGTON

DEFENDANT: MICHAEL WENBERGWEZ et; al;

2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT NAME THE COUNTY; EASTERN DISTRICT COURT.

3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 15-4102

4) NAME OF THE JUDGE ASSIGNED TO YOUR CASE THE HONORABLE EDUARDO C. ROBRENO, J.

5) APPROXIMATE DATE OF FILING LAWSUIT

6) IS THE CASE STILL PENDING? YES  NO

7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING FOR AN HONORABLE JUDGMENT FOR JUSTICE...

D) 1) PARTIES; TO THE PREVIOUS LAWSUIT

PLAINTIFF: JEROME WASHINGTON

DEFENDANTS: JOHN DOE et; al;

2) COURT (IF FEDERAL COURT, NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY; EASTERN DISTRICT COURT

3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 2:14-CV-05540-ER

4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE EDUARDO C. ROBRENO, J.

5) APPROXIMATE DATE OF FILING LAWSUIT

6) IS THE CASE STILL PENDING? YES  NO

7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING

E) 1) PARTIES; TO THE PREVIOUS LAWSUIT

PLAINTIFF: JEROME JUNIOR WASHINGTON

DEFENDANT: TOM WULF; et; al;

2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT NAME THE COUNTY; WESTERN DISTRICT COURT

3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 2:16-CV-01714-LPL

4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE MAGISTRATE JUDGE LESA PUPO LENIHAN.

PAGE 3 (3) 5) APPROXIMATE DATE OF FILING LAWSUIT  
6) IS THE CASE ~~CASE 2:18-CV-00342-JFC~~ Document 1 Filed 03/15/18 Page 3 of 5  
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING

F) 1) PARTIES TO PREVIOUS LAWSUIT  
PLAINTIFF: JEROME WASHINGTON  
DEFENDANTS: SUPT. ~~GILMORE~~ GLUNT ET. AL.  
2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT, NAME THE COUNTY; MIDDLE DISTRICT COURT  
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 1:16-CV-1828  
4) NAME OF THE JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE JOHN E. JONES II  
5) APPROXIMATE DATE OF FILING LAWSUIT?  
6) IS THE CASE STILL PENDING? YES  NO   
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE

G) 1) PARTIES; TO THE PREVIOUS LAWSUIT  
PLAINTIFF: JEROME JUNIOR WASHINGTON ET AL.  
DEFENDANT: SCI-GRATERFIELD SUPERINTENDENT MRS. LIND ET. AL.  
2) COURT (IF FEDERAL COURT NAME THE DISTRICT; IF STATE COURT NAME THE COUNTY; EASTERN DISTRICT COURT  
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 16-3424  
4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE LUCY V. CHEN  
5) APPROXIMATE DATE OF FILING LAWSUIT?  
6) IS THE CASE STILL PENDING? YES  NO   
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES  
12) THE PLAINTIFF IS STILL TRYING TO EXHAUSTION ALL POSSIBLE REMEDIES THAT ARE OFFERED OR THAT IS BEING ALLOWED AS AN INDIGENT PRISONER'S IT'S HARD TO GET COPIES FROM SCI-GREENE GRIEVANCE COORDINATOR BEING AN INDIGENT PRISONER LITIGATING PRO-SE HEREIN DETERMINE TO STOP DEFENDANTS CRUEL AND UNUSUAL PUNISHMENT LONG TERM DISCRETION ACTION OF EXCESSIVE FORCE DC-ADMCOU ISOLATED AND FORCE DC-ADMCOU UNCONSTITUTIONAL VIOLATION TO CUFFS BEING ASSAULT BEING SCI-GREENE SRTR PROGRAM IS AN UNCONSTITUTIONAL VIOLATION TO SECURITY HAD INFORMED PLAINTIFF EXHAUSTION OF REMEDIES AS PRISON GRIEVANCE DENIAL SNOZ LETTERING POLICY 13.8.1 THAT IS DEFINETLY BEING IGNORED JUST LIKE SCI-GREENE DENIAL SNOZ LETTERING AUTHORTIES THROUGHOUT AN EXCESSIVE FORCE DC-ADMCOU ASSAULT CLAIM V. CLAIM'S OF FACTUAL OBLIGATIONS

13) DEFENDANT C.O. J. JONES ON MARCH 28, 2017 FALSIFIED THE ELIGIBLE MISCONDUCT ORDER OR/AND DEFENDANT'S C.O. S. JONES STAFF MEMBER'S VERSION: ON THE ABOVE DATE AND TIME THIS OFFICER WAS ASSISTING IN REMAINING INMATE WASHINGTON STATED HE WAS NOT GOING TO LOCK IN HVO 282 FROM GB DAY ROOM BACK TO HIS CELL OF GBC 1. INMATE WASHINGTON STATED HE WAS NOT GOING TO LOCK IN AND TAKE IT IN. THIS OFFICER GAVE INMATE THREE DIRECT VERBAL ORDERS TO STAND UP AND LOCK IN AND TAKE IT IN. INMATE WASHINGTON THEN STOOD UP AND STARTED STRIKING THIS OFFICER IN MY LEFT LEG WITH HIS RIGHT FOOT SEVERAL TIMES. END OF STATEMENT... REFER TO HE DUE TO ASSAULT ON STAFF. (INCIDENT TIME 1536); (INCIDENT DATE: 3/28/17); (DATE OF REPORT 3/28/17); (PLACE OF INCIDENT GB-DAY Room); (STAFF INVOLVED OR WITNESSES L.T. SCHAMP AND C.O. ADAMSON); (TIME SERVED NOTICE AND DATE: 3/28/17 AT 20:27); (HEARING SCHEDULE; DATE AND TIME 3/30/17 AT 0800...)

M) DEFENDANT C.O. J. JONES HAD COMPLETELY SHOWN CRUEL AND UNUSUAL PUNISHMENT UPON THE PLAINTIFF BEING BRUTALLY ASSAULTED BY ATLEAST TEN DIFFERENT STAFF MEMBER'S PURSUANT TO THE MALICIOUS IN WELL OF INFAMY AND AGGRESSIVENESS TO THE HAPPENINGS ON 3/28/17 AT AROUND 3:30PM HOURS ON 2 TO 10 SHIFT BY THE INFAMOUS DEFENDANT C.O. J. JONES BRUTALITY JUDGMENT OF CR ASSAULT WITHIN DEFENDANT C.O. J. JONES OWN ORDER'S OF COMMAND WITHIN AN HIGHER STAFF MEMBER PRESENT OR WITNESSES L.T. SCHAMP ON MISCONDUCT

PAGE 4) DOCUMENTED REPORT # C-03959 FOR DEFENDANT C.O. J. JONES AND/OR TO INCLUDE THE PRECISELY CLEAR LEGAL PLEA OF DEFENDANT J.T. SCHAMP IS ALREADY ELIGIBLY IS AN DEFENDANT INTO CAPTION CASE NO. 16-1714-LPL

Case 2:18-cv-00342-JPC-LPL Document 1 Filed 03/15/18 Page 4 of 5

15.) PLAINTIFF HEREBY VERIFY THE FOREGOING SWORN INFORMATION IS THE TRUTH UPON THEE UNCONSTITUTIONAL VIOLATION'S FROM DEFENDANT C.O. JONES ON DATE: 3/28/17 AT AROUND 3:30 P.M. ON 2 TO 10 SHIFT HOURS. WERE THE PLAINTIFF WAS SITTING AT THE S.R.T. U-CA TABLE IN FRONT OF GB-01 WITH THE L.T. ~~SCHAMP~~ WHOM WAS TALKING TO THE PLAINTIFF AND ANOTHER INMATE AT THIS TIME UPON DEFENDANT C.C. JONES COMING UP TO PLAINTIFF SETTING AREA WITH ANOTHER ESCORTING OFFICER AS GROUP WAS BEING TAKEN IN AT THIS TIME GROUP ACTIVITIES WAS UP. WERE DEFENDANT C.O. JONES HAD ASKED THE PLAINTIFF WAS HE READY TO GO IN. OR ~~OFFICER~~ ~~HAD~~ ~~TAKEN~~ THE PLAINTIFF SAID YES AND STOOD UP FROM SETTING WERE BOTH OFFICIALS PRESENT OR OFFICER HAD TAKEN PLAINTIFF OUT OF LEG RESTRAINTS TO THE TABLE CUFFS OFF OF THE PLAINTIFF BELTCUFF AND TOOK PLAINTIFF OUT OF LEG RESTRAINTS TO THE TABLE SIT WERE PLAINTIFF HAD ASKED DEFENDANT C.O. J. JONES SAID NO I AM NOT MOVING THOSE BOOTS BECAUSE THEY ARE NOT MOVE DEFENDANT C.O. JONES SAID NO THEY ARE STAYING RIGHT THERE AND I'M GOING TO PUT FROM YOUR DOOR SO YOU CAN FISH NO THEY ARE STAYING RIGHT THERE AND I'M GOING TO PUT THAT PLASTIC THING RIGHT BESEDE YOUR DOOR LIKE YESTERDAY 3/27/17 WITH THOSE BOOTS AGAIN SO PLAINTIFF SAID I AM NOT GOING IN MY CELL UNTIL YOU MOVE THOSE DIRTY BOOTS FROM MY DOOR AND/OR PLAINTIFF THAN GRAVED THE TABLE UNTIL AS THE PLAINTIFF HANDS ARE STILL CUFFED UP WITH AN BELT CUFF. AT THE SAME EXACT TIME WHEN DEFENDANT J. JONES HAD SAID YOU ARE GOING IN YOUR CELL ONE WAY OR ANOTHER BY FORCE EVEN IF WE HAVE TO ASSAULT YOU, WERE PLAINTIFF EXCESSIVELY CHARGED PLAINTIFF WITHIN INFAMY BRUTAL FORCE WERE TWO OFFICIALS OR MORE HAD SHAMMED THE PLAINTIFF TO THE FLOOR WERE PRISON OFFICIALS WAS COMING FROM OUT OF NOWHERE BRUTALLY, AGGRESSIVELY, ASSAULTIVE TO THE PLAINTIFF AS THE PLAINTIFF WAS IN WAEST LINE TO HOLD THE PLAINTIFF IS STILL HANDCUFFED UP AT THE BRUTAL MOMENT OF DEFENDANT J. JONES INFAMY WERE THE PLAINTIFF WAS GETTING AGGRESSIVELY MANHANDLE AND ASSAULTED BY AROUND TEN DIFFERENT OFFICIALS ON THE GROUND...

16.) DEFENDANT ASSAULTIVE AND BATTERY WAS AT THE TIME PLAINTIFF WAS SUBDUE IN HANDCUFF

17.) DEFENDANT ASSAULTED THE PLAINTIFF TRYING TO SET DOWN AT GB UNIT TABLE

18.) DEFENDANT ASSAULTED THE PLAINTIFF BY RUSHING THE PLAINTIFF EXCESSIVELY WITHIN TACKLING THE PLAINTIFF BRUTALLY OFF OF THE TABLE STOOL

19.) DEFENDANT CONTINUE TO USE HIS WEIGHT AND PHYSICAL FORCE TO PEEEN THE PLAINTIFF UNMIND

20.) DEFENDANT BRUTAL FORCE TO PLAINTIFF BUD LEFT PLAINTIFF BLOODING ANALLY ON 3/28/17

21.) DEFENDANT EXCESSIVENESS BUSTED PLAINTIFF LIP ON 3/28/17

22.) DEFENDANT AGGRESSIVENESS WITH PLAINTIFF IS SUBDUE IN CUFFS LEFT MARKS ALL OVER THE PLAINTIFF HANDS WHICH BECOME BRUISED AND SWOLLEN

23.) DEFENDANT J. JONES HAD ASSAULTED THE PLAINTIFF ON 3/28/17 AROUND 3:30 P.M. ON 27010 SHIFT WERE THE PLAINTIFF WAS THAN TAKEN TO SEE ~~MEDICAL~~ THE MEDICAL NURSES WHICH WAS THE FEMALE NURSE'S PRESENT BUT BEFORE THE NURSE'S ARRIVED THE PLAINTIFF WAS VERY UPSAT AND/OR HAD BEEN HUMILIATED AND EMBARRASS BY DEFENDANT J. JONES ASSAULT AND BATTERY THAT HAD MADE THE PLAINTIFF EMOTIONALLY MAD AND ANGRY BECAUSE OF DEFENDANT J. JONES'S WRONGFULLY BRUTALLY BEATEN THE PLAINTIFF TO HAVE A BUSTED LIP WERE BLOOD WAS ON THE PLAINTIFF HANDS FROM PLAINTIFF LIP BLEEDING AND SWOLLEN WHICH LEFT MARKS WERE THE PLAINTIFF AFTER PLAINTIFF WAS EMBARRASS IN FRONT OF HU THE SRTU GB UNIT INMATE'S WHICH WERE THE PLAINTIFF HAD SAID ON CAMERA OUT OF FRUSTRATION AND ANGER UPON PLAINTIFF SAYING THAT IF I SEE THAT OFFICER AGAIN I AM GOING TO KILL HEM THAT OFFICER BATTER NOT NEVER BE AROUND ME. PLUS MORE VERBAL ABUSIVE WORDS OUT OF FRUSTRATION DEPRESSION FOR THE WORDS USED AFTER BEING MENTALLY, PHYSICALLY AND EMOTIONALLY DAMAGE BY DEFENDANT EXCESSIVELY ASSAULTED AND AGGRESSIVELY HANDCUFFED UP WITHOUT AND CAMERA BEING BY DEFENDANT IRRATIONAL OFFICIAL BRUTALITY OUT OF RETALIATION OR HATRED MALEICUS ILL WELL IRRATIONAL OFFICIAL VIOLATIONS...

24.) DEFENDANT C.O. JONES KEEP ON JUMPING DOWNWARD WITH HIS WEIGHT DOWN ON THE PLAINTIFF BODY WHILE THE PLAINTIFF IS CUFFED UP PEND TO THE GROUP

25.) DEFENDANT C.O. JONES WAS ENFORCED TO LEAVE OFF OF GB UNIT FOR HIS ACTIONS; NOT JUST ONE BUT TWELVE TOLD TO LEAVE OFF OF GB UNIT BY L.T. SCHAMP AS DEFENDANT C.O. JONES HAD CONTINUOLY TRIED TO COME BACK ON GB UNIT TO FINISH OFF THE ASSAULT THAT HE'VE STARTED

26.) DEFENDANT J. JONES TOOK IT UPON HIMSELF TO RUSH AND SHAM ME TO THE GROUP WHICH PLAINTIFF WAS

27) AT ALL RELEVANT TIMES DEFENDANT Supt. GELMORE WHO IS HELD ACCOUNTABLE FOR THE OVERALL CUSTODY CONTROL AND PROTECTION OF PRISONERS AND PRISON OFFICIALS SAFETY AND CARE ADMINISTRATIVE PROTECTION AND SHARE AN EQUAL PART OF HIS OFFICIAL'S VIOLATION UNDER THE PRACTICES POLICIES DO ADMIT ASSAULT PROCEDURAL LAW'S UNDER GELMORE AKNOWLEDGEMENT OR KNOWLEDGE OF ACTUAL EVENTS, LIKE MARCH 28, 2017 BUT IGNORE BY TURN INTO THE OPPOSED DIRECTION WITHIN AN BLIND EYE TO ASSUMPTION IT IS OKAY TO VIOLATED PLAINTIFF 8th AND 14th AMENDMENT RIGHTS TO THE CONSTITUTIONAL LAW'S OF PRISONERS RIGHTS ON 3/28/17 HEREBE, DEFENDANT WERE "PERSON" FOR PURPOSES OF 42 USC. SECTION § 1983 AND ACTED UNDER COLOR OF LAW DEPRIVE PLAINTIFF OF THEIR CONSTITUTIONAL RIGHTS, AS SET FORTH MORE FULLY ABOVE.

#### VI. RELIEF AND INJUNCTION

28) RELIEF AND INJUNCTION NO. MORE PRISON OFFICIAL'S ASSAULTIVE AND BATTERY ACTIONS WHY PRISONERS ARE HANDCUFFED UP AND SUBDUED

29) RELIEF AND INJUNCTION FOR THE BURDEN OF PAIN CAUSED FROM ASSAULTIVE OFFICIALS TO THE MENTAL HEALTH PATIENT'S SHOULD SHOW CAUSE FOR AN INJUNCTION SANCTION ON THEIR DUTY AND COST OF BURDEN TO THEIR EMPLOYMENT STATUS AND A SANCTION

30) RELIEF AND INJUNCTION FOR MENTAL HEALTH PRISON OFFICIAL'S TO HAVE AN LESS SANCTION ON THE USE OF CUFFS AND SHACKLES UPON MENTAL HEALTH MAINTAINING GROUP AND LESS DISCRETEON ON INMATES PLACEMENT.

#### VII: RELIEF FACTUAL COMPLAINTS

31) DEFENDANT Supt. GELMORE IS SUED IN HIS INDIVIDUAL CAPACITIES AND OFFICIAL CAPACITIES FOR 1,000,000 DOLLAR'S UNDER THE VIOLATION OF PLAINTIFF 8th AND 14th AMENDMENT RIGHTS.

32) DEFENDANT Supt. GELMORE IS HELUSED AT SCI-GREENE/175 PROGRESS DRIVE/WAYNESBURG PA 15370 NUMBER 724-852-2902/WWW.COR-STATE-PA.US/DEFENDANT IS SUPERINTENDENT/WARDEN OF SCI-GREENE CORRECTIONAL INSTITUTIONS.

33) DEFENDANT C.O. J. JONES IS SUED IN HIS INDIVIDUAL CAPACITIES AND OFFICIAL CAPACITIES FOR 1,000,000 DOLLAR'S UNDER THE VIOLATION OF PLAINTIFF 8th AND 14th AMENDMENT RIGHTS.

34) DEFENDANT C.O. J. JONES IS AT ADDRESS SCI-GREENE/175 PROGRESS DRIVE/WAYNESBURG PA 15370 NUMBER 724-852-2902/WWW.COR-STATE-PA.US/DEFENDANT IS ~~NOT~~ A CORRECTIONAL OFFICER AT SCI-GREENE

#### VIII. RELIEF CLAIMS

35) PLAINTIFF INCORPORATES BY REFERENCE PARAGRAPHS 1 THROUGH 34. OF THIS COMPLAINT

36) THE PLAINTIFF EIGHTH AMENDMENTS, AS APPLIED TO THE STATES BY THE FOURTEENTH AMENDMENT, PROHIBITS CRUEL AND UNUSUAL PUNISHMENT.

37) DEFENDANT'S POLICIES, PRACTICES AND PROCEDURES SYSTEMICALLY VIOLATE THE EIGHTH AMENDMENT RIGHTS OF PRISONERS WITH MENTAL ILLNESS. SUCH POLICIES PRACTICES VIOLATE THE EIGHTH AMENDMENT EXCESSIVE FORCE DO-ADM 001 ASSAULTIVE AND BATTERY, WITHOUT LIMITATION IN THE SRTU PROGRAM.

38) CONFINEMENT OF PRISONERS IN SCI-GREENE SRTU-PROGRAM WITH SMF/LD MENTAL III PATIENTS IS ENFORCED TO A LONG TERM OF EXCESSIVE FORCE AND AGGRESSIVE DISCRETION EXCESSIVELY ENFORCED TO WORSEN THE CONDUCT AND CONDITION OF INMATE'S WITH SMF/LD AS SCI-GREENE SRTU PROGRAM IS WORSE THAN CONFINEMENT IN A R.H.U. FOR THE CONDUCT TO BE DIRECTLY ATTRIBUTABLE TO DISTRACT AND DESTROY PLAINTIFF MENTAL ILLNESSES.

39) RELIEF TOON STAFF MEMBER TO ARREST AND GUARD PATIENTS WITH SERIOUS MENTAL HEALTH HELP NEEDED TO BE ADEQUATELY PROVIDED.

40) RELIEF PUNITIVE DAMAGES, NORMAL DAMAGES AND EVERY OTHER SUITABLE AND APPROPRIATE RELIEF THEREAS TO OFFER.

41) RELIEF CLINICAL AND RELIABLE STAFF UNDER MENTAL HEALTH TREATMENT AND CARE PROVIDED.

42) A PLAINTIFF SUING UNDER 1983 MUST ALLEGUE TWO "ELEMENTS" THAT SOME PERSON HAS DEPRIVED PLAINTIFF OF A "FEDERAL RIGHTS" AND THAT THE PERSON WHO HAS DEPRIVED HIM OF THAT RIGHT ACTED UNDER COLOR OF STATE OR TERRITORIAL LAW. AS PLAINTIFF IS PROSE LEGITANT UNDER THE UNITED STATES DECLARED PENALTY OR PENALTY

SERIAL NUMBER #V0282  
SCI-GREENE  
175 PROGRESS DRIVE  
WAYNESBURG PA 15370  
DATE MARCH 8, 2018  
XXXXXX